

## REMARKS

In view of the preceding amendments and the following comments, and pursuant to 37 C.F.R. § 1.111, Assignee respectfully requests reconsideration of the Office Action.

### **Summary of the Amendment**

Assignee has amended independent claim 6, and dependent claims 13, 17 and 22, which ultimately depend from claim 6. Support for the amendments can be found in the originally filed claims and the Application, at least at ¶¶ 0010-0011, 0050, 0093-0094, and 0107, and Figures 5, 6, and 7. The amendments do not add new matter. The Assignee respectfully requests reconsideration of pending claims 6-8, 13-17, and 22-25, and allowance of the present application in view of the amendments and the following remarks.

### **Detailed Remarks**

#### **I. Rejections Under 35 U.S.C. § 112, second paragraph**

The Office Action rejected claims 6-8, 13-17, and 22-25, under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. The Office Action, at page 2, asserted that the terms "each methodology" and "another methodology" lack a proper antecedent basis in the claim since the claim only recites "a methodology." Assignee respectfully traverses these rejections in view of the amendments to claims 6, 13, 17, and 22.

Claim 6, as amended, recites "defining a set of taxonomies comprising members of a universe of activity objects for a first methodology." Claim 6 further recites "mapping each methodology of a plurality of methodologies, including the first methodology and a second methodology." Claim 6 also recites "an instantiation of an activity object from the first methodology may be reused for the second methodology." The Application, at ¶ 0010, describes "a set of taxonomies common to a plurality of methodologies contained in the library such that the portion of activities is reusable for the plurality of methodologies." Thus, Assignee respectfully submits that claim 6, as

amended, complies with the requirements of § 112, second paragraph. For at least these reasons, independent claim 6 and dependent claims 7-8, 13-17, and 22-25, which depend from claim 6, comply with § 112, second paragraph.

Claim 13, as amended, which depends from claim 6, recites "the activity objects correspond to activities that describe a process of one of the methodologies." Claim 17, as amended, which ultimately depends from claim 6, recites "one object group is associated with planning the implementation of an application development project for one of the methodologies." Claim 22, as amended, which depends from claim 6, recites "the highest level document represents one of the methodologies mapped to one of the selections of a set of taxonomies." For at least the reasons given above regarding independent claim 6, dependent claims 13, 17, and 22, which depend from claim 6, comply with § 112, second paragraph.

## II. Rejections Under 35 U.S.C. § 102

The Office Action rejected claims 6-8, under 35 U.S.C. § 102(b) as being anticipated by Leymann et al (U.S. Patent Publication No. 2002/0026297) (hereinafter "Leymann"). Assignee respectfully traverses these rejections.

Independent claim 6, as amended, recites "defining a set of taxonomies comprising members of a universe of activity objects for a first methodology" and "organizing a set of task objects of singular granularity into object groups having in common a relation to one member of the taxonomy." Claim 6 further recites "receiving from the user, through the electronic display, a methodology mapping selection." In other words, claim 6 recites a three-tier hierarchy defined by a set of taxonomies comprising activity objects related to task objects, as well as user interactions. The Application, at ¶¶ 0050, 0094, and 0107, indicates that "one of the underpinnings for the methodology framework is to provide a three-tiered presentation layer", also referred to as a "three-tiered hierarchical user interface." The Office Action, at page 3, asserts that Leymann shows all the features of claim 6.

However, Leymann does not teach or suggest mapping a knowledge base into a three-tiered hierarchical framework, as claimed. Leymann, at ¶ 0010, indicates that the objective of the technology described therein is to "automatically derive from a process

model of a workflow management system or a computer system with comparable functionality (WFMS) a set of underlying application services." Leymann, at ¶ 0007, indicates that there are "several disadvantages" to manually "placing the individual application services/business processes into a taxonomy." Leymann, at ¶ 0088, further indicates that "a process activity within a certain process model may itself be a subprocess model comprising a network of activities interconnected" and teaches "to apply the current teaching recursively". In other words, Leymann describes automatically, without human interaction, recursively decomposing processes into numerous sub-processes. In clear contrast to the three-tiered hierarchy, as claimed, which facilitates human interaction, Leymann expresses neither the notion of limiting the recursive decomposition of processes nor the intent to receive or facilitate user interactions. Therefore, Leymann cannot be read to teach or suggest the three-tiered hierarchy, as claimed. Thus, claim 6 is patentable over the reference. For at least these reasons, claims 7-8, which depend from claim 6, are patentable over the reference.

In addition, claim 6, as amended, further recites "receiving from the user, through the electronic display, a methodology mapping selection for a plurality of methodologies, including the first methodology and a second methodology." Claim 6 also recites "mapping, with the methodology mapping selection, each methodology of the plurality of methodologies to a selection of a set of taxonomies from the user." The Application, at ¶¶ 0011 and 0093, describes mapping a methodology to "a selection of a set of taxonomies" and "an application server to allow authorized users access to methodologies throughout the corporate intranets and the Internet." The Office Action, at page 3, asserts that Leymann shows all the features of claim 6.

However, Leymann does not teach or suggest "receiving from the user, through the electronic display, a methodology mapping selection," as claimed, let alone "a selection of a set of taxonomies from the user," as also claimed. Instead, Leymann, at ¶¶ 0007 and 0009, indicates that "a technology is required that provides for the automatic generation of the appropriate taxonomy entries or even the generation of an appropriate taxonomy" and "only an automatic method of generating taxonomies is

feasible." Leymann, at ¶ 0011, indicates that an objective of the invention disclosed therein is to "provide a teaching for automatically deriving from a process model a taxonomy scheme of application services." In other words, Leymann does not teach or suggest "a selection of a set of taxonomies from the user," as claimed, let alone "receiving from the user, through the electronic display, a methodology mapping selection." Thus, claim 6 is patentable over the reference. For at least these reasons, claims 7-8, which depend from claim 6, are patentable over the reference.

Claim 7, which depends from claim 6, recites "activity objects are established by defining a first set of taxonomies sharing in common a first characteristic." Claim 7 further recites "defining a second set of taxonomies sharing in common a second characteristic" and "associating with an activity object one member of the first set of taxonomies and one member of the second set of taxonomies." In other words, activity objects, as claimed, are established corresponding to at least two distinct sets of taxonomies based on two different characteristics, namely, one characteristic from each of the two set of taxonomies. The Office Action, at page 4, asserts that Leymann shows all the features of claim 7.

However, Leymann does not teach or suggest an activity object, as claimed. Instead, Leymann, at ¶¶ 0014-0016 and 0072, indicates the steps of a "computerized method [that] provides access to an application service" and "to categorize objects means to assign them to predefined categories or classes from a taxonomy." Nowhere does Leymann teach or suggest using an activity object to associate one member of a first set of taxonomies and one member of a second set of taxonomies, as claimed. Thus, the features recited by claim 7 are independently patentable over the reference.

Claim 8, which depends from claim 7 and ultimately depends from claim 6, recites "the first characteristic is a time sequence, and the second characteristic is a skill set." In other words, at least one activity object, as claimed, corresponds to both a time sequence and a skill set characteristic. The Office Action, at page 4, asserts that Leymann shows all the features of claim 8.

However, Leymann does not teach or suggest an activity object established by defining a first characteristic that is a time sequence and a second characteristic that is

a skill set, as claimed. Leymann, at ¶¶ 0051, 0057, and 0073, indicates that “connectors link activities in a process model”, “data mining takes advantage of the infrastructure of stored data” and “categorization tool assigns documents to predefined categories.” Nowhere does Leymann teach or suggest an activity object established by defining a first characteristic that is a time sequence and a second characteristic that is a skill set, as claimed. Thus, the features recited by claim 8, in combination with claim 7, are independently patentable over the reference.

### **III. Rejections Under 35 U.S.C. § 103**

The Office Action rejected claims 13-17 and 22-25, under 35 U.S.C. § 103 as being unpatentable over Leymann in view of Pronstati et al. (U.S. Patent No. 6,678,716) (hereinafter “Pronstati”). Assignee respectfully traverses these rejections.

Independent claim 6, from which claims 13-17 and 22-25 depend, recites “receiving from the user, through the electronic display, a methodology mapping selection” and “mapping, with the methodology mapping selection, each methodology of the plurality of methodologies to a selection of a set of taxonomies from the user.” Claim 6, as amended, also recites “defining a set of taxonomies comprising members of a universe of activity objects for a first methodology” and “organizing a set of task objects of singular granularity into object groups having in common a relation to one member of the taxonomy.” In other words, claim 6 recites a three-tier hierarchy defined by a set of taxonomies comprising activity objects related to task objects. The Office Action, at pages 5-6, asserts that Leymann, in combination with Pronstati, shows all the features of claims 13-17 and 22-25.

However, Leymann, even in combination with Pronstati, does not teach or suggest mapping a knowledge base into a three-tiered hierarchical framework, as claimed. Neither does Leymann, alone or in combination with Pronstati, teach or suggest “receiving from the user, through the electronic display, a methodology mapping selection,” as claimed, let alone “a selection of a set of taxonomies from the user,” as also claimed. Leymann, as discussed above, fails to teach or suggest the features recited by claim 6.

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Pronsati fails to fill the gap left by Leymann. Instead, Pronsati is directed to a "process management system that includes task information indicative of tasks that define process steps for a group of processes." Pronsati, at col. 4, ll. 47-60, and Figure 1, describes a "hierarchical tree arrangement of tasks", a "root node task" and "child tasks of the root node task", and indicates that child tasks "represent individual steps of [a] technical process of [a] task." In other words, in clear contrast to claim 6, Pronsati does not express the slightest notion of a three-tier hierarchy, let alone a "receiving from the user, through the electronic display, a methodology mapping selection" and "mapping, with the methodology mapping selection, each methodology of the plurality of methodologies to a selection of a set of taxonomies from the user." Thus, independent claim 6 is patentable over the references, taken alone or in combination. For at least the same reasons, claims 7-8, 13-17, and 22-25, which depend from claim 6, are patentable over the references, taken alone or in combination.

#### Conclusion

In view of the above amendments and remarks, Assignee respectfully submits that this application is in condition for allowance and such action is earnestly requested. If for any reason the Application is not allowable, the Examiner is requested to contact the Assignee's undersigned attorney.

Respectfully submitted,



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